

EXHIBIT 5

From: [Eric R. Chad](#)
To: [Geyer, Kate](#); [RothschildMGTeam](#)
Cc: [ValveKTService](#); [Brent E. Routman](#)
Subject: RE: Valve v. Rothschild: Meet and Confer
Date: Wednesday, May 21, 2025 9:58:21 AM
Attachments: [image003.png](#)
[image001.png](#)

****CAUTION: External Email****

Kate,

We are in receipt of your email below as well Dario's letters from May 11th. We are available this Friday, May 23, at 2:30 PM CDT.

Our paralegal has been on vacation but has now returned. We are looking into the issues you raised regarding custodian metadata fields and Mr. Falcucci's privilege log and will provide a response as soon as we are able.

We are also investigating the issues you raised regarding RBDS's, PAM's, and Rothschild's response to Interrogatory Nos. 12, 6, and 8, respectively. However, at this time, it is our understanding that RBDS's, PAM's, and Rothschild's responses to Interrogatory Nos. 12, 6, and 8 are substantively accurate as Blink Global LLC and Symbology do not have rights to license or sublicense the '221 Patent. Should we learn information provided therein is incorrect or incomplete, we will supplement consistent with Rule 26(e).

With respect to citation to ROTHSCCHILD003181-82, that was a typographical error. It should read ROTHSCCHILD0031681-82. We will supplement RBDS's and PAM's responses accordingly.

PAM and RBDS are unaware of a written agreement regarding PAM's right to license the '221 Patent.

Finally, we do not understand your issue with PAM's response to Interrogatory No. 6 which you claim only provides information about RBDS and PAM. That response addresses RBDS, PAM, and assignment by Ariel Inventions and Mr. Rothschild. Can you please further explain your concern? With respect to supplementation of Mr. Rothschild's response to Interrogatory No. 8, we are conferring with our client and will let you know whether Mr. Rothschild will supplement his response.

Best,

From: Geyer, Kate <KGeyer@ktslaw.com>
Sent: Tuesday, May 20, 2025 6:04 PM
To: RothschildMGTeam <RothschildMGTeam@MerchantGould.com>
Cc: ValveKTService <ValveKTService@kilpatricktownsend.com>
Subject: Valve v. Rothschild: Meet and Confer

CAUTION - External.

Counsel:

Please provide a time to meet and confer this week about the numerous outstanding issues that Defendants continue to ignore, some of these for more than a month:

- The scope of Defendants' search for responsive information in ASANA (as requested in Valve's April 9, 2025 email)
- The outstanding issues in Valve's May 8, 2025 letter, including:
 - Whether Defendants would be open to agreeing to Valve's proposed compromise
 - Whether Defendants will agree to produce documents responsive to Request Nos. 62, 68-76 (and the corresponding discovery requests cited in the footnote) and when that production will occur
 - When Defendants will produce documents responsive to Request No. 65
 - Valve's May 11, 2025 letter regarding custodian metadata in Defendants' production
 - Valve's May 11, 2025 letter regarding Defendants' privilege log deficiencies
 - Valve's May 11, 2025 letter regarding Defendants' deficient responses to interrogatories regarding rights to license the '221 patent

To be clear, if Defendants do not have a response to these outstanding issues by the meet and confer or will not provide a date certain to provide that information, Valve will consider the parties at an impasse and seek Court intervention next week.



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